

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
SIDDIQUE MASIH,

Plaintiff,

-against-

Index No. 07 Civ. 9923
(RWS)

**NOTICE OF
APPEARANCE AND
ANSWER**

THREE STAR GIFT SHOP INC. AND NISAR AHMAD,

Defendants.

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PLEASE TAKE NOTICE that Defendants-Three Star Gift Shop Inc. and Nisar Ahmad hereby appears by the undersigned attorney and demands you serve all papers upon said attorney.

PLEASE TAKE FURTHER NOTICE the Defendant-Three Star Gift Shop Inc. and Nisar Ahmad hereby interposes the following answer to the Complaint.

1. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraphs 1, 2, 3, and 5 of the Complaint.

2. Denies the allegations contained in paragraphs 6, 8, 9, 10, and 11 of the Complaint.

3. As to paragraph 4 of the complaint admits that Three Star is a gift and electronic company located in New York and that Defendant- Nisar Ahmad is the President of Three Star, but denies the balance of allegations contained in said paragraph.

ANSWER TO COUNT I

4. As to Paragraph 13 of the Complaint, refer to the actual language as contained in the referred to Statutes and denies the balance of the allegations in that paragraph of the

Complaint.

5. Denies the allegations contained in paragraphs 14, 15, 16 ,17, 18, and 19 of the Complaint.

ANSWER TO COUNT II

6. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 21 of the Complaint.

7. Denies the allegations contained in paragraphs 22, 23, and 24 of the Complaint.

ANSWER TO THE “FIFTH CLAIM FOR RELIEF”

8. Denies the allegations contained in paragraphs 26, 27 and 28 of the Complaint.

FIRST AFFIRMATIVE DEFENSE

9. Either all of part of the Plaintiff’s claims are barred by the statute of limitations under New York State or Federal law prior to November 9, 2001.

SECOND AFFIRMATIVE DEFENSE

10. Plaintiff waived its right to seek recovery under the statutes alleged in the Complaint.

WHEREFORE, Defendant-Three Star Gift Shop Inc. and Nisar Ahmad demands judgment against the Plaintiff-Siddique Masih dismissing the Complaint.

Dated: New York, New York
February 29, 2008

JAFFE, ROSS & LIGHT LLP

By: _____

Burton R. Ross (BR-0588)

Attorneys for Defendant - Three Star Gift Shop Inc.
and Nisar Ahmad

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